

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Fayetteville Regional Office
County: Bladen
NC Facility ID: 0900055
Inspector's Name: Jeffrey D. Cole
Date of Last Inspection: 04/27/2020
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Smithfield Fresh Meats Corp. - Tar Heel</p> <p>Facility Address: Smithfield Fresh Meats Corp. - Tar Heel 15855 Highway 87 West Tar Heel, NC 28392</p> <p>SIC: 2011 / Meat Packing Plants NAICS: 311611 / Animal (except Poultry) Slaughtering</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0503, 02D .0515, 02D .0516, 02D .0521, 02D .0524, 02D .0539, 02D .1806, 02D .1100, 02Q .0317 of 02D .0530, 02Q .0513, 02Q .0317 of 02D .1111 NSPS: Subpart Dc, NESHAP: Subpart ZZZZ, Subpart JJJJJ PSD: N/A PSD Avoidance: SO₂ and NO_x NC Toxics: Yes 112(r): Yes Other: In order to avoid the applicability of 40 CFR 63 Subpart JJJJJ, the Permittee shall operate the existing boilers (ID Nos. ES-2 through ES-8) as gas-fired boilers defined in 40 CFR 63.11237.</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Robert Harris Environmental Manager (910) 862-7675 15855 NC 87 Tar Heel, NC 28392</p>	<p style="text-align: center;">Authorized Contact</p> <p>Donovan Owens General Manager (910) 862-7675 15855 NC 87 Tar Heel, NC 28392</p>	<p style="text-align: center;">Technical Contact</p> <p>Robert Harris Environmental Manager (910) 862-7675 15855 NC 87 Tar Heel, NC 28392</p>	<p>Application Number: 0900055.18B Date Received: 10/19/2018 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 07221/T22 Existing Permit Issue Date: 03/09/2018 Existing Permit Expiration Date: 07/31/2019</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2019	81.48	80.81	12.03	65.70	11.95	1.15	1.09 [Hexane, n-]
2018	18.04	89.45	9.70	69.96	12.69	1.10	1.04 [Hexane, n-]
2017	9.37	65.10	14.62	52.12	10.70	1.11	0.8854 [Hexane, n-]
2016	11.33	61.19	14.64	49.97	10.34	1.16	0.7894 [Hexane, n-]
2015	14.19	62.94	8.72	49.76	10.71	1.22	0.7128 [Hexane, n-]

<p>Review Engineer: Alice Wessner</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 07221/T23 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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1.Purpose of Application

The Smithfield Fresh Meats Corp. - Tar Heel (Smithfield) currently holds Title V Permit No. 07221T22 which expired July 31, 2019 for a meat processing plant in Tar Heel, Bladen County, North Carolina. This permit is for a permit renewal without modification. The renewal application was received October 19, 2018 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. The application will be processed according to renewal procedures in 15A NCAC 02Q .0513.

2.Facility Description

The Smithfield Fresh Meats Corp. - Tar Heel facility is a hog slaughter, meat preparation, and rendering operation. The facility has been in operation since 1992. The meat processing plant produces only fresh meat products. It is the largest packing plant in the world. Historically, its production has ranged from 30,000 to 35,500 hogs per day and averaging about 33,500 hogs per day, which equates to approximately 8 million pounds of meat per day and over 1 million pounds of rendering raw material per day. Hogs are slaughtered, processed, and all remains are sent to the rendering operation for further processing. The material for rendering comes from the Meat Processing plant as well as from dead stock. The rendering operation produces animal feed ingredients including feed fat (inedible lard), plasma from blood, blood meal, and bone meal (DRT).

3.History/Background/Application Chronology

History/Background

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|-------------------|--|
| August 18, 2014 | Air Permit No. 070221T17 was issued as a renewal with an expiration date of July 31, 2019. |
| February 20, 2015 | Air Permit No. 07221T18 was issued as a minor modification to make several changes to the permit including increasing the total facility rendering cooker capacity by replacing a small rendering cooker (ID No. ES-12a.1) with a new rendering cooker (ID No. ES-12a.3), replacing four rendering meal presses and three grease centrifuges that are included as part of the low intensity odorous plant operations (ID No. ES-12.c), increasing the total capacity of the condensable removal system (ID No. C1C) by replacing two condensers for the rendering cookers and adding two new condensers for a total of four condensers (ID Nos. C1C.1 through C1C.4), replacing other equipment with an “in-kind” replacement unit of the same capacity and by adding and replacing equipment included in the rendering plant room (ID No. ES-14). The modification was issued with an expiration date of July 31, 2019. |
| May 14, 2015 | Air Permit No. 07221T19 was issued to modify the monitoring, recordkeeping, and reporting requirements for the boilers (ID Nos. ES-2 through ES-8), which were formerly permitted as subject to 40 CFR Part 63 Subpart JJJJJ, “NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers” (GACT Subpart 6J). Smithfield operates these boilers |

as “gas-fired boilers” as defined in 40 CFR 63.11237 “**What definitions apply to this subpart**”? Therefore, they are not subject to the requirements of GACT Subpart 6J in accordance with 40 CFR 63.11195(e). The modification was issued with an expiration date of July 31, 2019.

- May 26, 2015 Air Permit No. 07221T20 was issued as an administrative amendment to correct a typographical error in the Equipment List in Section 1.0 of Air Permit No. 07221T19. The permit was issued with an expiration date of July 31, 2019.
- November 13, 2015 Air Permit 07221T21, a state-only modification in which the facility requested an increase in the modeled air toxics limit for ammonia under 15A NCAC 02D .1100, “Control of Toxic Air Pollutants” and the associated ammonia purchasing limit. The increases of these limits allowed the facility to charge the refrigeration system with enough ammonia to maintain proper operation. The modification was issued with an expiration date of July 31, 2019.
- March 9, 2018 Air Permit 07221T22, a name/ownership change, was issued with an expiration date of July 31, 2019.

Application Chronology

- October 19, 2018 Permit application 0900055.18B was received for Title V renewal. The application was received six months prior to the expiration date and was deemed complete.
- February 19, 2021 Draft permit and permit review forwarded to supervisors for comments.
- February 26, 2021 Received comments from Permitting Supervisor. Edits completed.
- March 1, 2021 Draft permit and permit review forwarded Jeffery Cole of the Fayetteville Regional Office (FRO) and DAQ Stationary Source Compliance Branch.
- March 12, 2021 Received comments from FRO.
- March 15, 2021 Draft permit sent to Donovan E. Owens of Smithfield Fresh Meats – Tarheel. No comments from Permittee noted.
- March 22, 2021 Received comments from Mr. Owens of Smithfield Fresh Meats – Tarheel. No edits from Permittee received.
- XXXXXX XX, 2021 Permit issued.

4. Permit Modifications/Changes

The table below outlines the proposed changes to the current permit (Permit No. 07221T22) for this renewal:

Page(s)	Section	Description of Change(s)
Cover letter	Cover letter	Updated permit revision numbers, dates, and acting Section Chief's name
Cover letter attachment	Insignificant Activities list	Updated footnotes to table Added ID No. IES-37 (formerly ID No. ES-37) to insignificant activities list and reference to footnote that source is subject to air toxic limits Added three new insignificant activities ID Nos. IES-FP, IES-GEN1 and IES-GEN2
Permit Cover Page	Permit	Changed permit revision numbers and dates
6	1	Moved ID. No. ES-37 (plant refrigeration system) to insignificant activities list from Emission Sources and Control Devices table Updated footnote in Emission Sources and Control Devices table
7	2.1	Added AOS and POS reference in Limits and Standards table Added Condition 2.1 A.1 Renumbered remaining section.
7-22	2.1	Added emission sources and control devices ID numbers throughout Updated permit language
9	2.1 A.4	Updated 15A NCAC 02D .0524 NSPS language
9	2.1 A.5	Deleted 2.1 A.5 Added and rewrote condition and added as 2.1 A.1 (see above) Renumbered remaining section
10-13	2.1 A.6	Updated 15A NCAC 02Q .0317 Avoidance Conditions for 40 CFR 63 6J language (POS) Updated 15 NCAC 02D .1111 MACT (AOS)
14-19	2.1 B.3	Updated 15A NCAC 02D .1111 40 CFR 63 4Z language
22	2.1 D	Changed reference from ID No. ES-37 to IES-37
23, 24	2.2 A.1	Updated 15A NCAC 02Q .0317 Avoidance Conditions for 15A 02D .0530 (Nitrogen Oxides) to current language Added additional testing language Condition 2.2 A.1.b. and renumbered remaining section.
24	2.2 A.2	Updated 15A NCAC 02Q .0317 Avoidance Conditions for 15A 02D .0530 (Sulfur Dioxide) to current language

26	2.2 B.1	Added table of control devices and pressure ranges to Condition 2.2. B.1.f.i
26	2.2 C.1	Updated condition to current permit language and referenced dates to Condition 2.2 C.1 and 2.2 C.2.c.
27-35	Section 3	Replaced General Conditions with current language Version 5.5

This permit renewal is without modification, however, the Permittee requested in the renewal application to have three insignificant activities added to the renewal permit. They are listed below:

- Add an emergency diesel fire pump engine (Cummins, 240 Hp, 179 kW) as an insignificant source. This source has been onsite for some time but was only recently noted. This source appears to be an “existing engine” as it was manufactured in May 1997 and it is subject to 40 CFR 63 Subpart ZZZZ requirements. The emission source ID No. IES-FP was added.
- Add a new diesel-fired electric emergency generator (Caterpillar, 201 Hp, 150 kW) as an insignificant source. The facility contacted the DAQ/FRO via email on 07/12/2017 regarding the addition of this source as either a permitted source with its inclusion in the permit or as an insignificant source. The emergency generator was installed and operational on 07/14/2017 and is subject to 40 CFR 60 Subpart IIII, as it is an emergency engine manufactured after April 1, 2006. It also appears to be a “New Engine” under 40 CFR 63 Subpart ZZZZ and, as such, demonstrates compliance with 40 CFR 63 Subpart ZZZZ by complying with requirements under 40 CFR 60 Subpart IIII. The emission source ID No. IES-GEN1 was added.
- Add a second, new (identical to the unit above), diesel-fired electric emergency generator (Caterpillar, 201 Hp, 150 kW) as an insignificant source. The facility contacted the DAQ/FRO via email on 03/21/2018 regarding the addition of this source and either its inclusion in the permit or as an insignificant activity. The emergency generator was installed and operational on 04/09/2018 and is subject to 40 CFR 60 Subpart IIII, as it is an emergency engine manufactured after April 1, 2006. It also appears to be a “New Engine” under 40 CFR 63 Subpart ZZZZ and, as such, demonstrates compliance with 40 CFR 63 Subpart ZZZZ by complying with requirements under 40 CFR 60 Subpart IIII. The emission source ID No. IES-GEN2 was added.

The Regional Office requested these changes/corrections in the renewed permit:

- Incorporate operating parameters for rendering control devices (i.e., pressure ranges of all scrubber’s CD ID Nos. C1V, C1P, C2V, C2P and C3) into Condition 2.2 B.1.f.i as required by 15A NCAC 02D .0539. These pressure ranges are currently only listed in the source descriptions in permit section 2.1 C. *A new table of control devices and pressure ranges was added to Condition 2.2 B.1.f.i.*
- Remove the Plant Refrigeration System (ID No. ES-37) from the permit and place it under Insignificant Activities Pursuant to 15A NCAC 02Q .0503(8) as ES ID No. IES-37. This

action was agreed to in the Permit Work Group because much of the ammonia lost from a refrigeration system is collected in the water through controlled purging and check valves, and then sent to the plant's wastewater treatment plant. The source would be exempt under 02Q .0102(g)(14)(F) as a source whose emissions are regulated only pursuant to Section 112(r) or Title VI of the Federal Clean Air Act. *Permit exemptions in 15A NCAC 02Q .0102 apply ONLY to non-Title V facilities, and thus, this action is not applicable to the refrigeration system at Smithfield. This emission source meets the definition of insignificant activities under 15A NCAC 02Q .0503(8). However, the DAQ will retain this emission source on the permit to preserve the limits for ammonia under the NC Air Toxics Condition. (See discussion in permit review for Air Permit No. T21 issued on November 13, 2015).*

- Remove the 15A NCAC 02D .1100 (State Enforceable Only) TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REQUIREMENT (listed as Condition 2.1 D.1) as the removal of the Plant Refrigeration System (ID No. ES-37) negates the need for this requirement. *Because ES-37 was not moved to the insignificant activities list for reasons explained above, Condition 2.1 D.1 was not removed from the permit.*

5.Regulatory Review

Smithfield is subject to the following regulations. The facility's equipment and operations have not changed since the last renewal in with the exception of the addition of three insignificant activities outlined above. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

- 15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers—Particulates from the boilers (ID. Nos. ES-1 through ES-8) shall not exceed 0.26 pounds per million Btu heat input. No monitoring, recordkeeping or reporting will be required for these sources. Continued compliance is anticipated.
- 15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes - Particulate matter (PM) emissions result from the rendering plant operation (ID Nos.ES-12, 13 and 14). Particulate matter emissions from the two cookers (ID Nos. ES-12a.2 and ES-12.a.3) are controlled by the condensables removable system (ID Nos. C1C.1 through C1C.5) in series with a venturi scrubber (ID No. C1V) that is in series with a packed tower wet scrubber (ID No. C1P). Particulate matter emissions from the hair hydrolyzer (ID No. ES-12b) and the low intensity odorous rendering plant operations (ID No. ES-12c) are controlled by a venturi scrubber (ID No. C1V) in series with a packed tower wet scrubber (ID No. C1P). Particulate matter emissions from the ring blood dryer (ID No. ES-13) are controlled by a venturi scrubber (ID No. C2V) in series with a packed tower wet scrubber (ID No. C2P). Particulate matter emissions from the rendering plant building ventilation system (ID No. ES-14) are controlled by a packed tower wet scrubber (ID No. C3). To ensure PM emissions meet this standard, monitoring, recordkeeping, and reporting requirements are required. Continued compliance is anticipated.
- 15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources
Sulfur Dioxide emissions from the boilers (ID Nos. ES-1 through ES-8), the gas-fired hair singers (ID Nos. ES-9, ES-10, ES-15 and ES-16), the biogas flare (ID No. ES-BPS), eighter No.2 fuel oil fired generators (ID Nos. ES-17 through ES-24), eleven No.2 fuel oil fired

electric generators (ID Nos. ES-26 through ES-36) and a ring blood dryer (ID No. ES-13) shall not exceed 2.3 pounds per million Btu heat input. No monitoring/recordkeeping/reporting is required from the firing of natural gas in this source. Continued compliance is anticipated.

- 15A NCAC 02D .0521, Control of Visible Emissions

Numerous emission sources at Smithfield are subject to 02D .0521. These emission sources must not have VE of more than 20 percent opacity when averaged over a six-minute period, except as specified in 15A NCAC 02D .0521(d).

These emission sources include the following:

- One biogas/natural gas-fired boiler (ID No. ES-1/CD-ES-1)
- One biogas/natural gas/No. 2/No. 4/No. 5/No. 6 fuel oil-fired boiler (ID No. ES-2/CD-ES-2)
- One natural gas/animal fat/biogas/No. 2/No. 4/No. 5/No. 6 fuel oil-fired boiler (ID No. ES-3)
- Five natural gas/animal fat/No. 2/No. 4/No. 5/No. 6 fuel oil-fired boilers (ID Nos. ES-4, ES-5, ES-6, ES-7, ES-8)
- Four natural gas-fired hair singers (ID Nos. ES-9, ES-10, ES-15, and ES-16);
- One biogas flare (CD-11) installed on the wastewater treatment plant (ID No. ES-BPS);
- Eight No. 2 fuel oil-fired electric generators (South Building: ID Nos. ES-17 to ES-24) with associated CO emissions reduction systems (ID No. C4)
- Eleven (No. 2 fuel oil-fired electric generators (North Building: ID Nos. ES-26 to ES-36) with associated CO emissions reduction systems (ID No. C5)

For the emission sources listed above no MRR is required when firing biogas, natural gas, or No. 2 fuel oil. Daily VE and associated recordkeeping and reporting is required when firing animal fat, No. 4, No. 5., or No. 6 fuel oils.

The rendering plant operation (ID Nos. ES-12a.2, ES-12.a.3, ES-12b, ES-12c, ES-13, and ES-14) is also subject to 02D .0521 and no MRR is required for the emission sources.

15A NCAC 02D .0524, New Source Performance Standards - Boilers (ES-2 through ES-8) are subject to 40 CFR Part 60, Subpart Dc. See Section 6 below for more discussion.

- 15A NCAC 02D .0539, Odor Control of Feed Ingredient Manufacturing Plants (State-Enforceable Only)

Smithfield is subject to this regulation because they have a rendering plant operation (ID Nos. ES-12a.2, ES-12.a.3, ES-12.b, ES-12.c, ES-13, and ES-14) that is used to process material for the production of feed-grade animal proteins or feed-grade animal fats and oils. This regulation requires that the exhaust be routed to odor control equipment, have an approved quality assurance plan for all monitoring devices and systems. The facility shall also have the proper transporting of raw materials, management of dead stock, inspection

and maintenance as recommended by the manufacturer. Daily readings of the oxidation reduction potential (ORP) on the control equipment, among other internal inspections, cleanings, calibrations, and maintenance of required pressures of the scrubbers shall be performed. Continued compliance with this regulation is anticipated.

- 15A NCAC 02D .1100, Control of Toxic Air Pollutants (State-Enforceable Only)
See Section 6 below for more discussion.
- 15A NCAC 02D .1111, Maximum Achievable Control Technology - The requirements under this regulation apply to Smithfield's boilers (ID Nos. ES-2 through ES-8). They are existing boilers with a heat input of greater than 5 mmBtu/hr with no auto trim. They operate primarily as "gas-fired" boilers. An energy assessment is required. The initial notification according to 40 CFR 63.11335(a)(2) has been met under the PSD avoidance. The General Condition P will cover Title V reporting. Additional recordkeeping requirements are due to the oil and non-hazardous secondary material fuels.
- 15A NCAC 02D .1806, Control of Odorous Emissions (State-Enforceable Only)
All emission sources at the Smithfield facility are subject to this regulation. Continued compliance is anticipated.
- 15A NCAC 02Q .0317, Avoidance Conditions - Smithfield has accepted permit limits for Limitation to Avoid 15A NCAC 02D. 0530: Prevention of Significant Deterioration (for SO₂ and NO_x). The Smithfield facility shall limit the amounts of SO₂ and NO_x in the combination of fuel usage in the boilers, singers, flare, fuel oil fired generators and the gas fired ring blood dryer to less than 250 tons per consecutive 12-month period. Continued compliance with this regulation is anticipated.
- 15A NCAC 02Q .0317, Avoidance Conditions for Limitation to Avoid Being Major for Hazardous Air Pollutants
15A NCAC 02D .1111, Maximum Achievable Control Technology (MACT) – Smithfield is an area source hazardous air pollutants (HAPs) and has accepted an avoidance condition for its boilers to be considered only "gas-fired boilers" as defined "National Emissions Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers." 60 CFR 63 Subpart JJJJJ, and, therefore, exempt from this rule. More discussion on MACT is provided below in Section 6.
- 15A NCAC 02Q. 0508(j) – Smithfield will be required to record in a logbook the scenario in which it is operating contemporaneously with making a change from one alternate operating scenario to another.

6.NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

The facility's boilers (ID Nos. ES-2 through ES-8) are currently subject to "NSPS for Small Industrial, Commercial, Institutional Steam Generating Units," 40 CFR Part 60, Subpart Dc. This renewal does not change this status. Two 'new' diesel-fired electric generators (ID Nos.

IES-GEN1 and IES GEN2) were added to the insignificant activities list that are subject to NSPS Subpart IIII.

NESHAPS/MACT

Smithfield has several boilers (ID Nos. ES-2 through ES-8) that fire primarily natural gas and only fire fuel oil and animal fat during periods of curtailment. As a result, these boilers meet the following definition of “gas-fired boilers” under 40 CFR 63.11237:

Gas-fired boiler includes any boiler that burns gaseous fuels [which include natural gas and biogas] not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

As specified in 40 CFR 63.11195(e), “gas-fired boilers” are NOT subject to “NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers,” 40 CFR 63 Subpart JJJJJ, unless they are operated in a manner other than as gas-fired boilers as defined in 40 CFR 63.11237 and as specified in Section 2.1 A.6.a of the permit.

Smithfield also has nineteen No. 2 fuel oil-fired electric generators subject to “NESHAP for Stationary Reciprocating Internal Combustion Engines,” 40 CFR 63 Subpart ZZZZ.

This permit renewal does not affect the status of being an area source of HAPs that are subject to GACT.

PSD

The permit does contain PSD Avoidance conditions that limit the emissions of SO₂ and NO_x from the boilers and certain other combustion sources to less than 250 tons per year on any 12-month rolling basis. However, the potential-to-emit from other sources at the facility that when added to the sources controlled by the PSD Avoidance condition, make the emissions from the facility greater than 250 tons per year. Thus, this facility is classified as a PSD major source. This permit renewal does not affect the PSD status.

112(r)

The facility is subject to Section 112(r) of the Clean Air Act requirements due to anhydrous ammonia stored on site exceeding the threshold quantity of 10,000 lbs. The facility is required to maintain a written Risk Management Plan (RMP). The facility was inspected for 112(r) on 12 July 2017 by Greg Reeves of Fayetteville Regional Office. No change with respect to 112(r) is anticipated under this permit renewal. Section 2.2 C.2 was updated to reflect the most current permitting language as part of this renewal. The next RMP will be due August 22, 2022.

CAM

40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility that have pre-controlled emissions above the major source threshold

and use a control device to meet an applicable standard. A CAM review was performed in the previous renewal dated August 18, 2014 by Jenny Shephard and the most recent modifications permitted February 20 and November 13, 2015 did not affect the status of the CAM applicability. This permit renewal does not change the facility's CAM status.

7.Facility Wide Air Toxics

Smithfield has previously conducted air modeling to demonstrate compliance with the acceptable ambient levels for ammonia from the refrigeration system (ID No. ES-37). Presently, the ammonia emission limit under 02D .1100 is 18 lb/hr. This renewal does not change that status; however, it was requested by the Fayetteville Regional Office in a P&O Review dated December 4, 2018 to move ES-37 to the insignificant activities list based on the ammonia source being exempt under 15A NCAC 02Q .0102(g)(14)(F) *a source whose emissions are regulated only pursuant to Section 112(r) or Title VI of the Federal Clean Air Act*. This rule does not apply to Title V permits. Although the refrigeration system is technically exempt from permitting pursuant to 15A NCAC 02A .0503(8), this emission source will remain on the permit to retain its ammonia limit under NC Air Toxics.

8.Facility Emissions Review

The facility-wide potential emissions do not change under this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the years 2015 through 2019 are provided in the header of this permit review.

9.Compliance Status

Smithfield has had the following compliance issues within the past five years:

- A Notice of Violation (NOV) was issued on February 3, 2017 for failing to comply with 02D .0539 Odor Control of Feed Ingredient Manufacturing Plants because at least one gauge had a pressure reading outside of the established range.
- An NOV was issued on February 3, 2017 for failing to comply with 02D .1111 MACT because at least one reading for pressure drop across DOC exceeded the established range for multiple engines per month.
- An NOV was issued on August 16, 2017 for failing to comply with 15A NCAC 02D .0539 Odor Control of Feed Ingredient Manufacturing Plants because the facility's recorded pressure gauge readings on packed tower wet scrubber (ID No. CIP) showed that for 86 out of 90 days (between March 1, 2017 and July 14, 2017), the pressure was recorded as being below its permitted range to operate.
- An NOV was issued on February 19, 2019 for failing to comply with Part 63 NESHAP/MACT Subpart ZZZZ 'Stationary Reciprocating Internal Combustion Engines' because an engine was not meeting the pressure drop parametric monitoring values.

All NOVs and the NOD have been resolved.

Based on information obtained during a phone conversation (due to COVID protocol) between Jeffery Cole of the Fayetteville Regional Office on April 27, 2020, Smithfield Fresh Meats, Corp. – Tarheel appeared to be in compliance with the requirements outlined in their current Air Permit

07221T22. A prior on-site inspection was conducted by Mr. Cole on January 17, 2020 at which Smithfield also appeared to be in compliance with all requirements of their permit.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.

11. Other Regulatory Considerations

- A PE Seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.

12. Recommendations

The permit renewal application for Smithfield Fresh Meats Corp. - Tar Heel, located in Tar Heel, Bladen County, North Carolina has been reviewed by DAQ to determine compliance with all the procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in this permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 07221T23.